

# GLENN AGRE BERGMAN & FUENTES

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**Via ECF**

The Honorable Sean H. Lane  
United States Bankruptcy Judge  
One Bowling Green  
New York 10004-1408

Re: *In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (SHL)*

Dear Judge Lane:

We have been retained by the debtor and debtor in possession (the “Debtor”) in the above-referenced Chapter 11 case to replace Windels, Marx, Lane & Mittendorf, LLP, and we will be filing a retention application promptly after consultation with the U.S. Trustee. Our firm was retained at the request of Michael and Sharan Sklar, and with the consent of Rita Sklar, to expedite the resolution of the case based on the new governance structure implemented by the Debtor.

Mr. Charles Simpson, lead counsel from the Windels, Marx firm, has ignored requests by the Debtor’s representatives to cooperate with the transition, and he has filed documents with this Court despite instructions from the Debtor that he should stop work.

The Debtor respectfully requests that the Windels, Marx firm be immediately discharged and that it cooperate with the transfer of all case files without further delay.

We look forward to addressing these and other issues at tomorrow’s status conference.

Respectfully submitted,



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Andrew K. Glenn

cc: All Counsel of Record (via ECF)  
Mr. Michael Sklar  
Ms. Sharan Sklar  
Ms. Rita Sklar